1 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 RUSSELL BRANDT, 9 Plaintiff. No. 2:17-cv-00703-RSM 10 **DEFENDANT WOEHLER'S** VS. RESPONSE TO SHOW CAUSE 11 COLUMBIA CREDIT SERVICES, INC., a Delaware Corporation, WALES & 12 WOEHLER, INC., P.S., a Washington Corporation, JASON L. WOEHLER, WSBA 13 Number 27658, and SACOR FINANCIAL, INC., a California Corporation, 14 Defendants, 15 16 TO: Russell Brandt, Plaintiff 17 AND TO: SaraEllen Hutchison and Sam Leonard, Attorneys for Plaintiff 18 COMES NOW Jason L Woehler and responds to the Court's Show Cause Order 19 regarding a stay of proceedings as follows: 20 Woehler agrees that proceeding in this matter as against the corporate entity, Wales & 21 Woehler, Inc. ("W &W"), would be contrary to the interests of judicial economy. W & W was 22 wound down upon Woehler's engagement in employment as in-house counsel with two 23 collection agencies. During the period of time wherein the actions that are the subject of this 24 lawsuit arose, Woehler was the sole owner and shareholder (and employee of) W & W. As 25 SHOW CAUSE RESPONSE - 1

such, litigating against W & W separate from Woehler would be duplicative, and also would have the net effect of depriving Woehler of exercising his rights in the bankruptcy court as Woehler would likely be taxed with whatever finding or judgment this Court entered against W & W while his bankruptcy proceedings are pending.

Woehler does not object to the plaintiff's proposed Order.

DATED this 13th of June, 2018.

By: /s Jason Woehler Jason Woehler, WSBA No. 27658 Attorneys for Defendants

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